

City of Independence
Water Pollution Control Department
P.O. Box 1019
Independence, Missouri 64051-0519

January 17, 2003

Ms. Rebecca Kane
Environmental Protection Agency
Office of Enforcement and Compliance Assurance, MC 2222A
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Notice of Availability of Enforcement and Compliance History Online (ECHO) Web Site

Dear Ms. Kane:

The following comments on are submitted on behalf of the City of Independence Water Pollution Control Department, which operates a 10 MGD Publicly Owned Treatment Works (POTW) utilizing sewage sludge incineration. The Independence POTW is subject to Clean Air Act and Clean Water Act regulations and formerly held a RCRA identification number.

- (1) The ECHO web site provides useful information about the compliance and enforcement program.
- (2) The site is easy to navigate.
- (3) The help text adequately explains the data.
- (4) The error correction process should be modified to allow corrections to be made to more than one line at a time. The site should also allow corrections to be made to Facility Characteristics (for example, incorrect designation as Synthetic Minor instead of a non-Federally reportable facility).
- (5) As a regulated facility,
 - A. Our facility report was not accurate. Corrections are needed to almost all the PCS data. This is likely a result of the way data was entered by the state agency and not a problem with the web site itself. However, it is disturbing to us that the public has ready access to inaccurate compliance data on our facility. The inaccurate portrayal of significant noncompliance status could subject our city to third party lawsuits and the expense of defending against them.
 - B. We submitted an online error report and received a response back as the web site states. The process was easy to use, but it only allowed us to correct one line at a time. Corrections are needed to ten other lines. The State Action Officer assigned to making corrections would probably prefer to receive one error report per facility rather than eleven. We have not yet heard a response back from the

State Action Officer but plan to contact him directly to request correction of the errors.

Thank you for the opportunity to comment on ECHO and to correct the information it provides on our facility. If you have any questions about our comments, please feel free to contact me at (816) 325-7711 or dbender@indepmo.org.

Sincerely,

Dorris L. Bender, QEP
Environmental Compliance Manager

c: Dick Champion, Jr.